

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:

PRIME CAPITAL VENTURES, LLC,

Debtor.

Case No. 24-10531 (REL)
Chapter 11

PAUL A. LEVINE, as the permanent receiver of
Prime Capital Ventures, LLC, CHRISTIAN H.
DRIBUSCH, as the Chapter 7 trustee of Kris
Daniel Roglieri, and COMPASS-CHARLOTTE
1031, LLC

Civil Case No. 24-cv-00939-(MAD)

Appellants,

v.

B AND R ACQUISITION PARTNERS, LLC and
JHM LENDING VENTURES, LLC,

Appellees.

**APPELLANTS' AMENDED STATEMENT OF THE ISSUES
PRESENTED AND DESIGNATION OF RECORD
ON APPEAL FROM BANKRUPTCY COURT**

Prime Capital Ventures, LLC (the “Debtor” or “Prime”), successor in interest to Paul A. Levine, the permanent receiver (the “Receiver”) of Prime appointed by Order dated January 24, 2024 of Judge Mae A. D’Agostino of the United States District Court for the Northern District of New York, Christian H. Dribusch, the Chapter 7 trustee (the “Trustee”) of Kris Daniel Roglieri (“Roglieri”), and Compass-Charlotte 1031, LLC (“Compass”, and collectively with Prime and the Trustee, the “Appellants”)¹, by and through their respective undersigned counsel, hereby respectfully submit this amended statement of the issues to be presented and designation

¹ On September 16, 2024, the Trustee, acting as the manager of Prime, filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Northern District of New York (the “Bankruptcy Court”) for Prime. See Docket No. 1 in Case No. 24-11029 (REL). As a result, the Receiver is no longer a party to the instant appeal.

of items to be included in the record, in connection with their appeal of the Memorandum Decision and Order entered by the United States Bankruptcy Court for the Northern District of New York in the captioned case on July 23, 2024, which dismissed Prime’s bankruptcy case under Case No. 24-10531 (REL) [Bankruptcy Docket No. 85] (the “Dismissal Order”). The Appellants have noticed their appeal of the Dismissal Order and the appeal has been assigned to the United States District Court for the Northern District of New York under index number 24-cv-00939-(MAD).

AMENDED STATEMENT OF ISSUES TO BE PRESENTED ON APPEAL

On August 15, 2024, the Appellants filed their statement of issues to be presented on appeal (the “Original Statement of Issues”). The Appellants seek to amend the Original Statement of Issues by removing the following issue on appeal identified in the Original Statement of Issues: Whether the Bankruptcy Court erred in holding that the Receiver did not have authority to file Prime’s bankruptcy case. The Appellants seek to only include the following issues on appeal (the “Amended Statement of Issues”):²

1. Whether the Bankruptcy Court erred when it held that the Trustee’s ratification of Prime’s bankruptcy case was not effective to validate the Prime bankruptcy case.
2. Whether the Bankruptcy Court erred when it held that under Delaware law and Prime’s operating agreement, the Trustee had no authority to participate in the management of Prime and therefore ratify and validate the Prime bankruptcy case.

**AMENDED DESIGNATION OF ITEMS
TO BE INCLUDED IN THE RECORD ON APPEAL**

On August 15, 2024, the Appellants filed their designation of items to be included in the record on appeal (the “Original Designation of Items”). The Appellants seek to amend the

² The Appellants reserve the right to seek leave to amend or supplement these issues in their opening brief.

Original Designation of Items by removing all docket numbers referencing the PDF audio files of certain hearings and adding a certain hearing transcript and only including the following items in the record on appeal (the “Amended Designation of Items”). For the avoidance of doubt, each designated item shall include any and all exhibits and documents annexed to and referenced within such item on the relevant case docket. Attached hereto as **Exhibit A** is a redline comparison of the Original Designation of Items and Amended Designation of Items.

In re Prime Capital Ventures, LLC, Bankruptcy Case No. 24-10531 (Bankr. N.D.N.Y.)

Docket Number	Date Filed	Document
1	05/14/2024	Chapter 11 Voluntary Petition for Non-Individuals. Fee Amount \$1738 Filed by Prime Capital Ventures, LLC. Chapter 11 Plan due by 09/11/2024. Disclosure Statement due by 09/11/2024. (Donato, Stephen) (Entered: 05/14/2024)
5	05/14/2024	Declaration re: (Declaration of Paul A. Levine Regarding the Debtor's Assets and Operations and in Support of the Chapter 11 Petition and Initial Pleadings) Filed by Prime Capital Ventures, LLC (related document(s)1). (Attachments: # 1 Exhibit A - District Court Order Appointing Receiver # 2 Exhibit B - Summary of ICA Deposits # 3 Exhibit C - Summary of Potential ICA Deposits) (Donato, Stephen) (Entered: 05/14/2024)
31	05/28/2024	Declaration Non-Individual , Disclosure of Compensation of Attorney for Debtor , Equity Security Holders , Non-Individual, Schedule AB, Schedule D, Schedule EF, Schedule G, Schedule H, Summary of Assets and Liabilities and Certain Statistical Information, Declaration,, Statement of Corporate Ownership filed., Statement of Financial Affairs for Non-Individual Filed by Prime Capital Ventures, LLC (related document(s)1). (Donato, Stephen) (Entered: 05/28/2024)
36	05/31/2024	Motion to Dismiss Case Filed by Prime Capital Ventures, LLC. (Van Tol, Pieter) (Entered: 05/31/2024)

37	05/31/2024	Declaration re: Declaration of Pieter Van Tol Filed by Prime Capital Ventures, LLC (related document(s)36). (Attachments: # 1 Exhibit A - Order entered on January 12, 2024 in the District Court Action # 2 Exhibit B - Submission made by Compass-Charlotte 1031, LLC on January 19, 2024 in the District Court Action # 3 Exhibit C - Submission made by Prime Capital on January 21, 2024 in the District Court Action # 4 Exhibit D - Order entered on January 24, 2024 in the District Court Action # 5 Exhibit E - Letter filed by the receiver for Prime Capital on March 21, 2024 in the Bankruptcy Court Action # 6 Exhibit F - Letter filed by Prime Capital on March 26, 2024 in the Bankruptcy Court Action) (Van Tol, Pieter) (Entered: 05/31/2024)
38	05/31/2024	Notice of Hearing on Motion to Dismiss Case Filed by Prime Capital Ventures, LLC (related document(s)36). Hearing scheduled for 6/26/2024 at 10:30 AM at Albany Courtroom. (Van Tol, Pieter) (Entered: 05/31/2024)
40	05/31/2024	Notification of Withdrawal of motion to dismiss by Christian H. Dribusch, Chapter 7 Trustee to the Bankruptcy Estate of Kris Daniel Roglieri as the sole member of Prime Capital Ventures, LLC. The dismissal motion was filed without the requisite authority. (related document(s): 36 Motion to Dismiss Case) Filed by Christian Dribusch (related document(s)36). (Dribusch, Christian) (Entered: 05/31/2024)
41	06/03/2024	Letter Re: in response to the letter dated May 31, 2024 from Christian H. Dribusch, who is the trustee in a Chapter 7 proceeding captioned In re Kris Daniel Roglieri, Case No. 24-10157 (related document(s)40). (Van Tol, Pieter) (Entered: 06/03/2024)
42	06/03/2024	Scheduling Order SETTING HEARING PURSUANT TO 11 U.S.C. § 105 (related document(s)36, 40). Status hearing to be held on 6/12/2024 at 10:30 AM at Albany Courtroom. (Rosenberg, Dana) (Entered: 06/03/2024)
46	06/04/2024	Application to Employ Bond, Schoeneck & King, PLLC as Counsel for Debtor Filed by Prime Capital Ventures, LLC. (Attachments: # 1 Exhibit A - Proposed Order # 2 Exhibit B - Donato Declaration) (Donato, Stephen) (Entered: 06/04/2024)
47	06/04/2024	Application to Employ BST & Co. CPAs, LLP as Financial Advisor to Debtor Filed by Prime Capital Ventures, LLC. (Attachments: # 1 Exhibit A - Proposed Order # 2 Exhibit B - Sawhney Declaration)

		(Donato, Stephen) Modified on 6/6/2024 (VanPatten, Kathleen). (Entered: 06/04/2024)
48	06/05/2024	Motion for 2004 Examination , Motion (Application for Entry of an Order Authorizing the Issuance of Subpoenas for the Production of Documents and Deposition Testimony Pursuant to Bankruptcy Rule 2004 and Granting Related Relief) Filed by Prime Capital Ventures, LLC. (Attachments: # 1 Exhibit A - Proposed Order) (Donato, Stephen) (Entered: 06/05/2024)
	06/12/2024	Hearing Held; MOTION TO DISMISS @ DOC#36 TO BE WITHDRAWN, PER TERMS ON RECORD and Continued (related document(s): 42). Hearing scheduled for 07/10/2024 at 10:30 AM at Albany Courtroom. (OConnell, Theresa) (Entered: 06/12/2024)
52	06/21/2024	Adjournment Request, hearing scheduled for 7/10/2024 at 10:30 a.m. in Albany (Letter of Adjournment of Motion for Order Authorizing Issuance of Subpoenas and Related Relief) Filed by Prime Capital Ventures, LLC (related document(s)48). (Donato, Stephen) (Entered: 06/21/2024)
53	06/21/2024	Motion for Turnover (Motion for Entry of an Order Directing Turnover of Property of the Debtor's Estate) Filed by Prime Capital Ventures, LLC. (Attachments: # 1 Exhibit A - Title Report) (Donato, Stephen) (Entered: 06/21/2024)
54	06/21/2024	Notice of Hearing on Motion for Entry of an Order Directing Turnover of Property of the Debtor's Estate Filed by Prime Capital Ventures, LLC (related document(s)53). Hearing scheduled for 7/17/2024 at 10:30 AM at Albany Courtroom. (Attachments: # 1 Certificate of Service) (Donato, Stephen) (Entered: 06/21/2024)
56	06/25/2024	Letter Re: (Letter advising the Court that parties have crafted a term sheet for a path forward in this case) Filed by Prime Capital Ventures, LLC. (Donato, Stephen) (Entered: 06/25/2024)
57	06/25/2024	Motion to Dismiss Case Filed by B & R Acquisitions Partners, LLC, JHM Lending Ventures, LLC. (Attachments: # 1 Exhibit 1 - Declaration of Matthew W. McDade # 2 Exhibit A - Order to Show Cause for the Appointment of a Receiver on an Emergency Basis and for Expediated Discovery # 3 Exhibit B - Memorandum-Decision and

		Order (January 24, 2024) # 4 Exhibit C - Memorandum-Decision and Order (March 19, 2024) # 5 Exhibit D - B&R Parties JAMS Arbitration Award # 6 Exhibit E - B&R Parties Judgment (Confirmation Proceeding) # 7 Exhibit F - B&R Parties Judgment Lien (Virginia Beach, VA)) (Everman, Michael) (Entered: 06/25/2024)
58	06/25/2024	Notice of Hearing on Motion to Dismiss Bankruptcy Case Filed by B & R Acquisitions Partners, LLC, JHM Lending Ventures, LLC (related document(s)57). Hearing scheduled for 7/17/2024 at 10:30 AM at Albany Courtroom. (Everman, Michael) (Entered: 06/25/2024)
61	07/08/2024	Motion for Joint Administration with Case No.: 24-10157; Motion to Convert Case From Chapter 11 to Chapter 7 (Joint Motion for Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019 Approving Stipulation and Granting Relief) Filed by Kris Daniel Roglieri, Prime Capital Ventures, LLC. (Attachments: # 1 Exhibit A - Proposed Stipulation and Order) (Donato, Stephen) Modified on 7/8/2024 (Weiler, Sara). (Entered: 07/08/2024)
62	07/08/2024	Motion to Shorten Time (related documents 61 Motion to Settle/Compromise) (Application for Entry of an Order Reducing Time for Notice of Joint Motion for Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019 Approving Stipulation and Granting Relief) Filed by Prime Capital Ventures, LLC, Kris Daniel Roglieri (related document(s)61). (Donato, Stephen) (Entered: 07/08/2024)
63	07/08/2024	Declaration re: (Declaration of Stephen A. Donato in Support of Application for Entry of an Order Reducing Time for Notice of Joint Motion for Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019 Approving Stipulation and Granting Relief) Filed by Prime Capital Ventures, LLC (related document(s)61, 62). (Donato, Stephen) (Entered: 07/08/2024)
64	07/08/2024	TEXT ORDER: Upon review of the Motion to Shorten Time and the Declaration of Stephen A. Donato (ECF Nos. 6263), and finding that there are no exceptional circumstances which warrant shortened notice, the Court respectfully declines to grant the request to shorten time (ECF No. 62). So Ordered this 8th day of July 2024 by Robert E. Littlefield, Jr., United States Bankruptcy Judge (related document(s)62, 63). (Rosenberg, Dana) (Entered: 07/08/2024)

66	07/09/2024	LLC Authority Filed by Christian Dribusch. (Dribusch, Christian) (Entered: 07/09/2024)
67	07/09/2024	Reply to (related document(s): 46 Application to Employ Bond, Schoeneck & King, PLLC as Counsel for Debtor) Statement of No Objection filed by the Bankruptcy Estate of Kris Daniel Roglieri as the sole member of Prime Capital Ventures, LLC Filed by Christian Dribusch (related document(s)46). (Dribusch, Christian) (Entered: 07/09/2024)
68	07/09/2024	Reply to (related document(s): 47 Ex Parte Application to Employ BST & Co. CPAs, LLP as Financial Advisor to Debtor) Statement of No Objection by the Bankruptcy Estate of Kris Daniel Roglieri to the Retention of BST & CO. CPAS, LLP as the Debtor in Possession Financial Advisor Filed by Christian Dribusch (related document(s)47). (Dribusch, Christian) (Entered: 07/09/2024)
69	07/09/2024	Reply to (related document(s): 48 Motion for 2004 Examination , Motion (Application for Entry of an Order Authorizing the Issuance of Subpoenas for the Production of Documents and Deposition Testimony Pursuant to Bankruptcy Rule 2004 and Granting Related Relief)) Statement of No Objection from the Bankruptcy Estate of Kris Daniel Roglieri as the sole member of Prime Capital Ventures, LLC Filed by Christian Dribusch (related document(s)48). (Dribusch, Christian) (Entered: 07/09/2024)
70	07/09/2024	TEXT ORDER: The Debtor's Motion for 2004 Examination (ECF No. 48) shall be heard on July 17, 2024, at 10:30 a.m. Parties may appear in-person or telephonically. So Ordered this 9th day of July 2024 by Robert E. Littlefield, Jr., United States Bankruptcy Judge (related document(s)48). (Rosenberg, Dana) (Entered: 07/09/2024)
73	07/10/2024	Objection to (related document(s): 57 Motion to Dismiss Case)Authority Moot Through Ratification of Bankruptcy Filing by Sole Member of Debtor Filed by Christian Dribusch (related document(s)57). (Dribusch, Christian) (Entered: 07/10/2024)
76	07/10/2024	Objection to (related document(s): 57 Motion to Dismiss Case) Filed by Compass-Charlotte 1031, LLC (related document(s)57). (Attachments: # 1 Certificate of Service) (Zapala, Matthew) (Entered: 07/10/2024)

77	07/10/2024	Objection to (related document(s): 57 Motion to Dismiss Case)(Prime Capital Ventures LLC's Objection to B and R Acquisition Partners, LLC and JHM Lending Ventures, LLC's Motion to Dismiss Bankruptcy Case) Filed by Prime Capital Ventures, LLC (related document(s)57). (Attachments: # 1 Exhibit A - Receiver Order # 2 Exhibit B - ER Tennessee Preliminary Conference Order # 3 Exhibit C - ER Tennessee Decision and Order) (Donato, Stephen) (Entered: 07/10/2024)
80	07/12/2024	TEXT ORDER: The Joint Motion for Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019 Approving Stipulation and Granting Related Relief (ECF No. 61) is hereby removed from the default calendar and shall be heard on the regular motion calendar on July 31, 2024, at 10:30 a.m. So Ordered this 12th day of July 2024 by Robert E. Littlefield, Jr., United States Bankruptcy Judge (related document(s)74). (Rosenberg, Dana) (Entered: 07/12/2024)
85	07/23/2024	Memorandum, Decision and Order (Related Document 57). (Rosenberg, Dana) (Entered: 07/23/2024)
	07/23/2024	Hearing Not Held. MOOT - per Memorandum, Decision and Order @ doc#85 (related document(s): 48). (OConnell, Theresa) (Entered: 07/23/2024)
86	07/23/2024	Notice of Dismissal re: 85. (Rosenberg, Dana) (Entered: 07/23/2024)
	07/23/2024	Hearing Not Held. MOOT - per Memorandum, Decision and Order @ doc#85 (related document(s): 53). (OConnell, Theresa) (Entered: 07/23/2024)
	07/23/2024	Hearing Not Held. MOOT - per Memorandum, Decision and Order @doc#85 (related document(s): 61). (OConnell, Theresa) (Entered: 07/23/2024)
89	07/29/2024	Notice of Appeal District Court. <i>Joint Notice of Appeal</i> Fee Amount \$298 Filed by Compass-Charlotte 1031, LLC, Christian Dribusch, Paul A. Levine, Prime Capital Ventures, LLC (related document(s) 85). Appellant Designation due by 08/12/2024. (Donato, Stephen) (Entered: 07/29/2024)

	07/29/2024	Receipt of Notice of Appeal(24-10531-1-rel) [appeal,ntcapl] (298.00) filing fee. Receipt number A11913495, amount \$ 298.00. (Re:Doc# 89) (U.S. Treasury) (Entered: 07/29/2024)
	07/29/2024	Election to Appeal to District Court Filed by Compass-Charlotte 1031, LLC, Christian Dribusch, Paul A. Levine, Prime Capital Ventures, LLC (related document(s) 89). (Smith, Nicole) (Entered: 07/30/2024)
90	07/30/2024	Appeal Cover Letter re: Filing of Notice of Appeal (related document(s) 89). (Attachments: # 1 Notice of Appeal) (Smith, Nicole) (Entered: 07/30/2024)
103	10/2/2024	Transcript regarding Hearing Held 07/17/2024 re: Motion to Dismiss. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING, TRANSCRIPT RELEASE DATE IS 1/2/2025. Until that time the transcript may be viewed at the Bankruptcy Court or a copy may be obtained from the official court transcriber. Court Reporter/Transcriber J&J Court Transcribers, Inc., Telephone number 609-586-2311. (related document: 57). Notice of Intent to Request Redaction Deadline Due By 10/9/2024. Redaction Request Due By 10/23/2024. Redacted Transcript Submission Due By 11/4/2024. Transcript access will be restricted through 1/2/2025. (Simmons, Dawn) (Entered: 10/02/2024)

In re Kris Daniel Roglieri, Bankruptcy Case No. 24-10157 (Bankr. N.D.N.Y.)

Docket Number	Date Filed	Document
1	02/15/2024	Chapter 11 Subchapter V, Voluntary Petition for individuals. Fee Amount \$1738 Filed by Kris Daniel Roglieri. Chapter 11 Plan Small Business Subchapter V Due by 05/15/2024. (Walsh, Brendan) (Entered: 02/15/2024)
9	02/16/2024	Order Scheduling Section 1188 Conference and Related Deadline. Status hearing to be held on 3/27/2024 at 11:00 AM at Albany CourtRoom. Pre-Status Report Due By 3/13/2024. (Rosenberg, Dana) (Entered: 02/16/2024)

11	02/16/2024	Notice of Appointment of Subchapter V Trustee. Mark J. Schlant-Trustee added to the case. Filed by U.S. Trustee. (Penpraze, Lisa) (Entered: 02/16/2024)
26	02/22/2024	Statement Re:Concerning Financial Records Filed by Kris Daniel Roglieri. (Attachments: # 1 Exhibit A) (Barsalona, Joseph) (Entered: 02/22/2024)
27	02/22/2024	Declaration re: Local Bankruptcy Rule 2015-2 Filed by Kris Daniel Roglieri. (Attachments: # 1 Exhibit A) (Barsalona, Joseph) (Entered: 02/22/2024)
39	02/29/2024	Motion to Extend Deadline to File Schedules or Provide Required Information Filed by Kris Daniel Roglieri. (Attachments: # 1 Exhibit A) (Barsalona, Joseph) (Entered: 02/29/2024)
41	02/29/2024	Order Granting Motion to Extend Deadline to File Schedules or Provide Required Information until March 22, 2024, at 4:00 p.m. (Related Doc # 39). (Rosenberg, Dana) (Entered: 02/29/2024)
42	03/01/2024	Update of Deadlines. Inventory of Property due 3/22/2024. Schedules A-J due 3/22/2024. Declaration Concerning Schedules due 3/22/2024. Statement of Financial Affairs due 3/22/2024.Summary of Assets and Liabilities and Certain Statistical Information due 3/22/2024. (Rosenberg, Dana) (Entered: 03/01/2024)
44	03/06/2024	Application to Employ Pashman Stein Walder Hayden, P.C as Counsel for the Debtor Filed by Kris Daniel Roglieri. (Attachments: # 1 Exhibit A # 2 Exhibit B) (Barsalona, Joseph) (Entered: 03/06/2024)
57	03/11/2024	Limited Objection to (related document(s): 44 Application to Employ Pashman Stein Walder Hayden, P.C as Counsel for the Debtor , 46 <i>Motion for Entry of Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals</i>)and <i>Objection to Motion to Establish Compensation Procedures</i> Filed by Paul A Levine (related document(s)44, 46). (Levine, Paul) (Entered: 03/11/2024)
63	03/13/2024	Motion to Extend Time to File 2015.3 Reports and Granting Related Relief Filed by Kris Daniel Roglieri. (Attachments: # 1 Exhibit A)

		(Barsalona, Joseph) (Entered: 03/13/2024)
64	03/13/2024	Pre-Status Conference Report, Filed by Kris Daniel Roglieri. (Barsalona, Joseph). Related document(s) 9 Order Scheduling Section 1188 Conference and Related Deadline. Modified on 3/14/2024 (Cardinal, Lisa). Modified on 3/20/2024 (VanPatten, Kathleen). (Entered: 03/13/2024)
65	03/13/2024	Motion of Debtor for Entry of an Order Authorizing Arrangement Between Debtor and U.S. Attorney Regarding Certain Vehicles, in addition to Motion To Modifying the Automatic Stay to the Extent Necessary to Implement Such Arrangement, and Granting Related Relief Filed by Kris Daniel Roglieri. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D) (Barsalona, Joseph) (Entered: 03/13/2024)
68	03/15/2024	Order Granting Motion to Extend Time to File 2015.3 Reports (Related Doc # 63). (Rosenberg, Dana) (Entered: 03/15/2024)
	03/15/2024	Meeting of Creditors Continued Filed by U.S. Trustee. 341(a) meeting to be held on 4/4/2024 at 11:00 AM at First meeting Ch11 Albany. (Penpraze, Lisa) (Entered: 03/15/2024)
69	03/18/2024	Declaration re: /Supplemental Declaration of Joseph C. Barsalona II in Support of Debtor's Application for Entry of an Order Under Sections 327(a), 328(a), and 1107(b) of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Rules 2014-1 and 2016-1 Authorizing Retention and Employment of Pashman Stein Walder Hayden, P.C. as Counsel for the Debtor Nunc Pro Tunc to the Petition Date Filed by Kris Daniel Roglieri (related document(s)44). (Barsalona, Joseph) (Entered: 03/18/2024)
73	03/20/2024	Limited Objection to (related document(s): 44 Application to Employ Pashman Stein Walder Hayden, P.C as Counsel for the Debtor) Filed by U.S. Trustee (related document(s)44). (Penpraze, Lisa) (Entered: 03/20/2024)
74	03/20/2024	Exhibit UST Exhibits - Redacted Filed by U.S. Trustee (related document(s)73). (Penpraze, Lisa) (Entered: 03/20/2024)

75	03/20/2024	Objection to (related document(s): 46 Motion for Entry of Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals) Filed by U.S. Trustee (related document(s)46). (Penpraze, Lisa) (Entered: 03/20/2024)
76	03/20/2024	Objection to (related document(s): 44 Application to Employ Pashman Stein Walder Hayden, P.C as Counsel for the Debtor , 46 Motion for Entry of Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals) Filed by 1800 Park Avenue LLC (related document(s)44, 46). (Miesen, Chad) (Entered: 03/20/2024)
77	03/20/2024	Statement Re:/Notice of Filing of Engagement Letter Pursuant to the Debtor's Application For Entry of an Order Sections 327(a), 328(a), and 1107(b) of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016 and Local Rules 2014-1 and 2016-1 Authorizing Retention and Employment of Pashman Stein Walder Hayden, P.C. as Counsel for the Debtor Nunc Pro Tunc to the Petition Date Filed by Kris Daniel Roglieri. (Attachments: # 1 Exhibit A) (Barsalona, Joseph). Related document(s) 44 (Entered: 03/20/2024)
78	03/20/2024	Supplemental Objection to (related document(s): 73 Objection) Filed by U.S. Trustee (related document(s)73). (Penpraze, Lisa). Related document(s) 44 (Entered: 03/20/2024)
80	03/22/2024	Individual, Schedule AB, Schedule D, Schedule EF, Schedule G, Schedule H, Schedule I, Schedule J, Summary of Assets and Liabilities and Certain Statistical Information, Declaration, Filed by Kris Daniel Roglieri. (Barsalona, Joseph) (Entered: 03/22/2024)
81	03/22/2024	Statement of Financial Affairs for Individual Filed by Kris Daniel Roglieri. (Barsalona, Joseph) (Entered: 03/22/2024)
83	03/22/2024	Omnibus Reply to (related document(s): 44 Application to Employ Pashman Stein Walder Hayden, P.C as Counsel for the Debtor , 46 Motion for Entry of Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals, 57 Objection, 69 Declaration, 73 Objection, 74 Exhibit, 75 Objection, 76 Objection, 77 Statement Re:, 78 Objection) / Filed by Kris Daniel Roglieri (related document(s)75, 57, 74, 78, 76, 69, 44, 73, 77, 46). (Barsalona, Joseph) (Entered: 03/22/2024)

91	03/27/2024	Objection to (related document(s): 65 Motion of Debtor for Entry of an Order Authorizing Arrangement Between Debtor and U.S. Attorney Regarding Certain Vehicles, Motion To Modifying the Automatic Stay to the Extent Necessary to Implement Such Arrangement, and Granting Related Relief)Objection and Reservation of Rights of Denali State Bank and Woodside Credit, LLC to the Motion of Debtor for Entry of an Order (I) Authorizing Arrangement Between Debtor and US. Attorney Regarding Certain Vehicles, (II) Modifying the Automatic Stay, to the Extent Necessary to Implement Such Arrangement, and (III) Granting Related Relief Filed by Denali State Bank and Woodside Credit, LLC (related document(s)65). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H) (Roy, Brian) (Entered: 03/27/2024)
94	04/02/2024	Order Authorizing Retention and Employment of Pashman Stein Walder Hayden, P.C. as counsel for the Debtor Nunc Pro Tunc to the Petition Date (Related Doc # 44). (Rosenberg, Dana) (Entered: 04/02/2024)
95	04/02/2024	ORDER DENYING Debtor's Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals (Related Doc # 46). (Rosenberg, Dana) (Entered: 04/02/2024)
97	04/03/2024	Monthly Operating Report for Filing Period February 15, 2024 to February 29, 2024 Filed by Kris Daniel Roglieri. (Barsalona, Joseph) (Entered: 04/03/2024)
98	04/03/2024	Application to Employ Dreyer Boyajian LLP as Special Counsel Filed by Kris Daniel Roglieri. (Attachments: # 1 Exhibit A # 2 Exhibit B) (Barsalona, Joseph) (Entered: 04/03/2024)
100	04/03/2024	Adversary case 24-90008-1. (02 (Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy))), (67 (Dischargeability - 523(a)(4), fraud as fiduciary, embezzlement, larceny)) Complaint by 1800 Park Avenue LLC against Kris Daniel Roglieri, Prime Commercial Lending, LLC, Prime Capital Ventures, LLC, Kimberly A. Humphrey, Erik Martin, Scott DiBerardinis. Fee Amount \$ 350.. (Miesen, Chad) (Entered: 04/03/2024)
102	04/04/2024	Letter Re: Requesting section 105 conference Filed by Kris Daniel Roglieri (related document(s)65). (Jaffe, Henry) (Entered: 04/04/2024)

104	04/04/2024	Scheduling Order Setting Hearing Pursuant to 11 U.S.C. § 105 re: Content of Motion at Document 65 (related document(s)65, 102). Hearing scheduled for 4/10/2024 at 10:00 AM at Albany CourtRoom. (Rosenberg, Dana) (Entered: 04/04/2024)
107	04/05/2024	Consent to Substitute Attorney, terminating Edward A. Cho-O'Leary. /Notice of Withdrawal and Substitution of Counsel Filed by Kris Daniel Roglieri. (Barsalona, Joseph) (Entered: 04/05/2024)
108	04/05/2024	Consent to Substitute Attorney, terminating Edward A. Cho-O'Leary. /Notice of Withdrawal and Substitution of Counsel Filed by Kris Daniel Roglieri. (Barsalona, Joseph) (Entered: 04/05/2024)
109	04/09/2024	Objection to (related document(s): 65 Motion of Debtor for Entry of an Order Authorizing Arrangement Between Debtor and U.S. Attorney Regarding Certain Vehicles, Motion To Modifying the Automatic Stay to the Extent Necessary to Implement Such Arrangement, and Granting Related Relief) Filed by Tina Roglieri (related document(s)65). (Culnan, Brian) (Entered: 04/09/2024)
110	04/09/2024	Letter Re: Government's Position on Hearing Scheduled for April 10, 2024 Filed by United States Attorney's Office (related document(s)65, 104). (Clark, Cathleen) (Entered: 04/09/2024)
111	04/10/2024	Objection to (related document(s): 98 Application to Employ Dreyer Boyajian LLP as Special Counsel) Filed by 1800 Park Avenue LLC (related document(s)98). (Miesen, Chad) (Entered: 04/10/2024)
113	04/12/2024	Report Re: Periodic Report Regarding Value, Operations, and Profitability of Entities Which the Debtors Estate Holds a Substantial or Controlling Interest Filed by Kris Daniel Roglieri. (Barsalona, Joseph) (Entered: 04/12/2024)
114	04/16/2024	Limited Objection to (related document(s): 98 Application to Employ Dreyer Boyajian LLP as Special Counsel) Filed by U.S. Trustee (related document(s)98). (Attachments: # 1 Exhibit) (Penpraze, Lisa) (Entered: 04/16/2024)
117	04/22/2024	Adversary case 24-90010-1. (41 (Objection / revocation of discharge - 727(c),(d),(e))), (67 (Dischargeability - 523(a)(4), fraud as fiduciary, embezzlement, larceny)), (68 (Dischargeability - 523(a)(6), willful and

		malicious injury)) Complaint by Paul A. Levine, as Receiver of Prime Capital Ventures LLC against Kris Daniel Roglieri. Fee Amount \$ 350.. (Attachments: # 1 Adversary Proceeding Cover Sheet) (Levine, Paul) (Entered: 04/22/2024)
118	04/22/2024	Monthly Operating Report for Filing Period March 2024 Filed by Kris Daniel Roglieri. (Barsalona, Joseph) (Entered: 04/22/2024)
119	04/23/2024	Motion to Convert Chapter 11 to Chapter 7 or Dismiss . Filed by U.S. Trustee. (Penpraze, Lisa) Modified on 4/23/2024 (Cardinal, Lisa). Modified on 4/23/2024 (Bazan, Judy). (Entered: 04/23/2024)
122	04/23/2024	Clerk's Notice Re: U.S. Trustee Notice to Convert or Dismiss (related document(s):120). (Rosenberg, Dana) (Entered: 04/23/2024)
124	04/25/2024	Response to (related document(s): 119 Motion to Convert Chapter 11 to Chapter 7 . Fee Amount \$15) JOINDER IN UNITED STATES TRUSTEES MOTION TO CONVERT OR DISMISS Filed by Compass-Charlotte 1031, LLC (related document(s)119). (Attachments: # 1 Certificate of Service) (Heller, Justin) (Entered: 04/25/2024)
129	05/06/2024	Response to (related document(s): 119 Motion to Convert Chapter 11 to Chapter 7 . Fee Amount \$15) Filed by Paul A. Levine (related document(s)119). (Attachments: # 1 Exhibit 1) (Levine, Paul) (Entered: 05/06/2024)
133	05/07/2024	Response to (related document(s): 119 Motion to Convert Chapter 11 to Chapter 7 . Fee Amount \$15) 526 MURFREESBORO, LLCS JOINDER IN UNITED STATES TRUSTEES MOTION TO CONVERT OR DISMISS Filed by 526 Murfreesboro, LLC (related document(s)119). (Attachments: # 1 Certificate of Service) (Heller, Justin) (Entered: 05/07/2024)
134	05/07/2024	Response to (related document(s): 119 Motion to Convert Chapter 11 to Chapter 7 . Fee Amount \$15) NEWLIGHT TECHNOLOGIES, INC.S JOINDER IN UNITED STATES TRUSTEES MOTION TO CONVERT OR DISMISS Filed by Newlight Technologies, Inc. (related document(s)119). (Attachments: # 1 Certificate of Service) (Heller, Justin) (Entered: 05/07/2024)

135	05/07/2024	Joinder Piper Capital Funding LLC's Joinder in United States Trustee's Motion to Convert or Dismiss Filed by Piper Capital Funding LLC (related document(s)119). (Attachments: # 1 Certificate of Service) (Powers, Jon) (Entered: 05/07/2024)
137	05/07/2024	Response to (related document(s): 119 Motion to Convert Chapter 11 to Chapter 7 . Fee Amount \$15) Filed by NYS Department of Taxation and Finance (related document(s)119). (Klose, Susanna) (Entered: 05/07/2024)
138	05/07/2024	Joinder Filed by 1800 Park Avenue LLC (related document(s)119). (Attachments: # 1 Certificate of Service re Joinder to Motion to Convert) (Miesen, Chad) (Entered: 05/07/2024)
139	05/08/2024	Joinder (Amended) Filed by Newlight Technologies, Inc. (related document(s)119 134). (Attachments: # 1 Exhibit A - Roglieri Emails # 2 Certificate of Service) (Heller, Justin). Modified on 5/8/2024 (Davis, Darcy). (Entered: 05/08/2024)
140	05/08/2024	Joinder of ER Tennessee LLC in United States Trustee's Motion to Convert or Dismiss Case Filed by ER Tennessee LLC (related document(s)119). (Lombardo, Joseph) (Entered: 05/08/2024)
141	05/09/2024	Motion to Extend Time to Object to Discharge/Dischargeability Filed by Compass-Charlotte 1031, LLC. (Attachments: # 1 Proposed Order) (Heller, Justin) (Entered: 05/09/2024)
144	05/13/2024	Motion to Extend Time to Object to Discharge/Dischargeability Filed by Piper Capital Funding LLC. (Attachments: # 1 Proposed Order) (Powers, Jon) (Entered: 05/13/2024)
147	05/13/2024	Motion to Extend Time to Object to Discharge or Dischargeability Filed by ER Tennessee LLC. (Attachments: # 1 Exhibit A (Proposed Order)) (Lombardo, Joseph) (Entered: 05/13/2024)
150	05/13/2024	Motion to Extend Time to Object to Discharge or Dischargeability Filed by JHM Lending Ventures, LLC, B and R Acquisition Partners, LLC. (Attachments: # 1 Proposed Order) (Little, Brendan) (Entered: 05/13/2024)

155	05/14/2024	Notice of Withdrawal of Application to Employ Dreyer Boyajian LLP as Special Counsel (related document(s) 98 Application to Employ) /Notice of Withdrawal of Debtor's Application for Entry of an Order Under Sections 327(e), 328(a), and 1107(b) of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Rules 2014-1 and 2016-1 Authorizing Retention and Employment of Dreyer Boyajian LLC as Special Counsel for the Debtor Nunc Pro Tunc to the Petition Date Filed by Kris Daniel Roglieri (related document(s)98). (Barsalona, Joseph) Modified on 5/15/2024 (Davis, Darcy). (Entered: 05/14/2024)
159	05/15/2024	Order Granting Motion to Convert Case From Chapter 11 to Chapter 7 (Related Doc # 119). (Rosenberg, Dana) (Entered: 05/15/2024)
160	05/15/2024	Notice of Appointment of Trustee . Christian H. Dribusch-Trustee added to the case. Filed by U.S. Trustee. (Penpraze, Lisa) (Entered: 05/15/2024)
161	05/15/2024	Notice of Deadlines. Chapter 7 Statement of Your Current Monthly Income Form 122A-1 Due:5/29/2024. Chapter 7 Means Test Form 122A-1Supp Exemption Due: 5/29/2024. Statement of Intent due 6/14/2024. (Rosenberg, Dana) (Entered: 05/15/2024)
163	05/16/2024	Trustee's Notice of Assets & Request for Notice to Creditors Filed by Christian H. Dribusch-Trustee. (Dribusch-Trustee, Christian) (Entered: 05/16/2024)
164	05/16/2024	Application to Employ Christian H. Dribusch, Esq. as Trustee Bankruptcy Counsel Filed by Christian H. Dribusch-Trustee. (Dribusch-Trustee, Christian) (Entered: 05/16/2024)
165	05/16/2024	Notice Fixing Last Date to File Proofs of Claim. Proofs of Claim due by 8/14/2024. (Rosenberg, Dana) (Entered: 05/16/2024)
166	05/16/2024	Motion for Turnover of property of the bankruptcy estate directed to the Debtor Filed by Christian H. Dribusch-Trustee. (Dribusch-Trustee, Christian) (Entered: 05/16/2024)
167	05/16/2024	Motion to Shorten Time (related documents 166 Motion for Turnover) Filed by Christian H. Dribusch-Trustee (related document(s)166).

		(Dribusch-Trustee, Christian) (Entered: 05/16/2024)
169	05/16/2024	Motion to Withdraw as Attorney /Motion of Pashman Stein Walder Hayden, P.C. to Withdraw as Counsel to the Debtor Filed by Kris Daniel Roglieri. (Attachments: # 1 Exhibit A) (Barsalona, Joseph) (Entered: 05/16/2024)
170	05/16/2024	Motion to Shorten Time (related documents 169 Motion to Withdraw as Attorney) Filed by Kris Daniel Roglieri (related document(s)169). (Barsalona, Joseph) (Entered: 05/16/2024)
171	05/16/2024	Order Granting Motion to Shorten Time (Related Doc # 167) Hearing scheduled for 5/20/2024 at 01:30 PM at Albany Courtroom (Related Doc # 166). Opposition shall be submitted to the Court by May 20, 2024, at 12:00 pm. (Rosenberg, Dana) (Entered: 05/16/2024)
173	05/16/2024	Order Granting Motion to Shorten Time (Related Doc # 170) Hearing scheduled for 5/29/2024 at 09:15 AM at Albany Courtroom (Related Doc # 169). (Rosenberg, Dana) (Entered: 05/16/2024)
181	05/20/2024	Response to (related document(s): 166 Motion for Turnover of property of the bankruptcy estate directed to the Debtor) (Reservation of Rights to Trustee's Turnover Motion) Filed by Prime Capital Ventures, LLC (related document(s)166). (Donato, Stephen) (Entered: 05/20/2024)
182	05/20/2024	TEXT ORDER: Due to a conflict the Court is adjourning the motion for turnover of property (ECF No. 166) to 4:00 p.m., on May 20, 2024. Call in information and all deadlines remain the same (related document(s)166). SO ORDERED MAY 20, 2024, by Robert E. Littlefield, Jr., U.S. Bankruptcy Judge. (Rosenberg, Dana) (Entered: 05/20/2024)
183	05/20/2024	Objection to (related document(s): 166 Motion for Turnover of property of the bankruptcy estate directed to the Debtor) Filed by Tina Roglieri (related document(s)166). (Culnan, Brian) (Entered: 05/20/2024)
188	05/22/2024	Order Granting Motion for Turnover Over Opposition. Debtor is to immediately turn over possession, custody, and control of the Estate Assets (Related Doc # 166). (Rosenberg, Dana) (Entered: 05/22/2024)

189	05/28/2024	Letter Requesting release of funds. Filed by Kris Daniel Roglieri. (Rosenberg, Dana) (Entered: 05/28/2024)
190	05/28/2024	Letter Re: Trustee Response to Debtor Request for Release of Funds Filed by Christian H. Dribusch-Trustee (related document(s)189). (Dribusch-Trustee, Christian) (Entered: 05/28/2024)
191	05/28/2024	Application for Compensation for Mark J. Schlant-Trustee, Trustee Chapter 11, Period: 2/19/2024 to 5/16/2024, Fee: \$7480.00, Expenses: \$109.68. Filed by Mark J. Schlant-Trustee. (Attachments: # 1 Notice # 2 Proposed Order # 3 Certificate of Service) (Schlant-Trustee, Mark) (Entered: 05/28/2024)
192	05/29/2024	ORDER GRANTING MOTION OF PASHMAN STEIN WALDER HAYDEN, P.C. TOWITHDRAW AS COUNSEL TO THE DEBTOR. (Related Doc # 169) (Schaaf, Thomas) (Entered: 05/29/2024)
194	05/30/2024	Meeting of Creditors. 341(a) meeting to be held on 6/18/2024 at 02:45 PM at Zoom.us/join - Dribusch: Meeting ID 249 190 8144, Passcode 1191985814, Phone 1 (680) 214-4529. Last day to oppose discharge or dischargeability is 8/19/2024. Government Proof of Claim due by 8/13/2024. Proofs of Claim due by 7/24/2024. (Rosenberg, Dana) (Entered: 05/30/2024)
197	06/04/2024	Supplemental Motion for Turnover aid to enforcement of Turnover Order of the Bankruptcy Court Filed by Christian H. Dribusch-Trustee. (Dribusch, Christian) (Entered: 06/04/2024)
198	06/04/2024	EX PARTE ORDER APPROVING FORM, MANNER AND SUFFICIENCY OF NOTICE re: Motion for a Supplemental Order to Aid in the Turnover Order ECF #188 (related document(s)197). Hearing scheduled for 6/7/2024 at 01:30 PM at Albany Courtroom. (Rosenberg, Dana) (Entered: 06/04/2024)
205	06/10/2024	SUPPLEMENTAL ORDER on the Chapter 7 Case Trustee Motion for Turnover (Related Doc # 197). (Rosenberg, Dana) (Entered: 06/10/2024)
207	06/10/2024	Notice of Hearing of First and Final Application of Pashman Stein Walder Hayden, P.C. as Counsel for the Debtor and Debtor in Possession, for Allowance of Compensation and for Reimbursement of

		All Actual and Necessary Expenses Incurred for the Period February 15, 2024 through and Including May 15, 2024 Filed by Pashman Stein Walder Hayden, P.C. (related document(s)206). Hearing scheduled for 7/10/2024 at 09:15 AM at Albany Courtroom. (Barsalona, Joseph) (Entered: 06/10/2024)
213	06/25/2024	Letter Re: (Letter advising the Court that parties have crafted a term sheet for a path forward in this case) Filed by Prime Capital Ventures, LLC. (Donato, Stephen) (Entered: 06/25/2024)
214	07/03/2024	Objection to (related document(s): 206 Final Application for Compensation for Pashman Stein Walder Hayden, P.C., Attorney, Period: 2/15/2024 to 5/15/2024, Fee: \$379,353.00, Expenses: \$4,934.87.) Filed by Christian H. Dribusch-Trustee (related document(s)206). (Dribusch-Trustee, Christian) (Entered: 07/03/2024)
215	07/08/2024	Motion for Joint Administration with Prime Capital Ventures, LLC, Case No.: 24-10531; (Joint Motion for Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019 Approving Stipulation and Granting Relief) Filed by Prime Capital Ventures, LLC, Kris Daniel Roglieri. (Attachments: # 1 Exhibit A - Proposed Joint Stipulation and Order) (Donato, Stephen) Modified on 7/8/2024 (Weiler, Sara). (Entered: 07/08/2024)
216	07/08/2024	Motion to Shorten Time (related documents 215 Motion to Settle/Compromise) (Application for Entry of an Order Reducing Time for Notice of Joint Motion for Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019 Approving Stipulation and Granting Relief) Filed by Prime Capital Ventures, LLC, Kris Daniel Roglieri (related document(s)215). (Donato, Stephen) (Entered: 07/08/2024)
217	07/08/2024	Declaration re: (Declaration of Stephen A. Donato in Support of Application for Entry of an Order Reducing Time for Notice of Joint Motion for Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019 Approving Stipulation and Granting Relief) Filed by Prime Capital Ventures, LLC (related document(s)216). (Donato, Stephen) (Entered: 07/08/2024)
218	07/08/2024	TEXT ORDER: Upon review of the Motion to Shorten Time and the Declaration of Stephen A. Donato (ECF Nos. 21617), and finding that there are no exceptional circumstances which warrant shortened notice,

		the Court respectfully declines to grant the request to shorten time (ECF No. 216). So Ordered this 8th day of July 2024 by Robert E. Littlefield, Jr., United States Bankruptcy Judge (related document(s)216, 217). (Rosenberg, Dana) (Entered: 07/08/2024)
220	07/08/2024	Stipulation By William K. Harrington, Christian H. Dribusch, Joseph C. Barsalona, II. Filed by U.S. Trustee (related document(s)206). (Penpraze, Lisa) (Entered: 07/08/2024)
225	07/10/2024	Order Granting Application For Compensation (Related Doc # 191) Granting for Mark J. Schlant-Trustee, fees awarded: \$7480.00, expenses awarded: \$109.68. (Rosenberg, Dana) (Entered: 07/10/2024)
226	07/12/2024	TEXT ORDER: The Joint Motion for Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019 Approving Stipulation and Granting Related Relief (ECF No. 215) is hereby removed from the default calendar and shall be heard on the regular motion calendar on July 31, 2024, at 10:30 a.m. So Ordered this 12th day of July 2024 by Robert E. Littlefield, Jr., United States Bankruptcy Judge (related document(s)223). (Rosenberg, Dana) (Entered: 07/12/2024)
229	07/15/2024	Application to Employ Saratoga Auto Museum as Auctioneer Filed by Christian H. Dribusch-Trustee. (Dribusch-Trustee, Christian) (Entered: 07/15/2024)
231	07/22/2024	Order Granting Application to Employ The Dribusch Law Firm as attorney for the Trustee (Related Doc # 164). (Rosenberg, Dana) (Entered: 07/22/2024)
233	07/24/2024	Order Mooting Motion For Joint Administration on Case 1:2024-bk-10157-rel with Member case 24-10531. In a decision dated July 23, 2024, the Court dismissed Primes bankruptcy proceeding 24-10531 and rendered this Joint Motion moot (Related Doc # 215). (Rosenberg, Dana) (Entered: 07/24/2024)
234	07/25/2024	Letter Re: direction on proceeding with a proposed Order relating to the June 7, 2024 hearing Filed by Christian H. Dribusch-Trustee (related document(s)). (Dribusch-Trustee, Christian) (Entered: 07/25/2024)

235	07/25/2024	ORDER SETTING HEARING PURSUANT TO 11 U.S.C. § 105 (related document(s)234). Status hearing to be held on 7/31/2024 at 02:00 PM at Albany Courtroom. (Rosenberg, Dana) (Entered: 07/25/2024)
238	07/31/2024	Letter Re: Withdrawing Portion of Motion Filed by Christian H. Dribusch-Trustee (related document(s)197). (Dribusch-Trustee, Christian) (Entered: 07/31/2024)
240	08/07/2024	Exhibit Auctioneer Bond Filed by Christian H. Dribusch-Trustee (related document(s)229). (Dribusch-Trustee, Christian) (Entered: 08/07/2024)
241	08/07/2024	Order Authorizing Trustee to Retain Saratoga Automobile Museum to represent him as the auctioneer (Related Doc # 229). (Rosenberg, Dana) (Entered: 08/07/2024)
242	08/12/2024	Motion to Sell Property under Section 363(b) Filed by Christian H. Dribusch-Trustee. (Dribusch, Christian) (Entered: 08/12/2024)

Respectfully submitted:

Dated: New York, New York
October 9, 2024

**KLESTADT WINTERS JURELLER
SOUTHARD & STEVENS, LLP**

By: /s/ Fred Stevens

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*Proposed General Counsel to Prime Capital
Ventures, LLC*

Dated: October 9, 2024
Albany, New York

THE DRIBUSCH LAW FIRM

By: /s/ Christian H. Dribusch

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Chapter 7 Trustee of the Estate of Daniel Kris Roglieri

Dated: October 9, 2024
Albany, New York

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By: /s/ Justin A. Heller

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